



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VIII  
1860 LINCOLN STREET  
DENVER, COLORADO 80295-0699

OCT 27 1983

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FILE NO. L1-2  
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OCT 31 1983  
Utah Div. Of  
Environmental Health

REF: 8AW-WM

Mr. Robert A. Bingham  
IRECO Chemicals  
Kennecott Building, 7th Floor  
Salt Lake City, Utah 84133

RE: Resource Conservation and  
Recovery Act (RCRA)  
Proposed Compliance Order  
Under RCRA for new and  
existing IRECO facilities  
EPA I.D.#'s UTD980666721  
UTD070546445  
UTD009089277

Dear Mr. Bingham:

We have reviewed the record on your request for a permit to construct and operate a new facility for the detonation of waste explosives in Tooele County, Utah. Since regulations pertaining to thermal treatment have not yet been promulgated by EPA, we are unable to issue a RCRA Part B permit for the facility at this time. As an alternative, we have proposed to EPA headquarters that we develop a compliance order for the new and existing facilities, incorporating some technical standards for the new facility that now seem appropriate. Development of a Compliance Order is intended to be a non-confrontational approach to the issue.

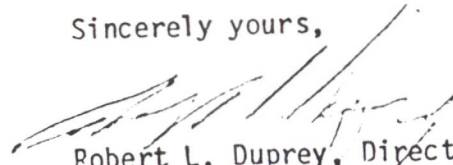
It is important for EPA Headquarters to evaluate our proposed action. We also feel compelled to avoid further unnecessary delays. Therefore, we have drafted the Order and enclose it herewith for your review and comment. We trust that parallel reviews by Headquarters, IRECO, and the State will not be counterproductive, and suggest we take that risk with the goal of the quickest resolution of the issue now possible.

We had understood through past discussions that the existing facility was to be replaced by the new one. We saw that as a benefit, due to the increased level of protection for the public and environment that could result. However, you have now decided to keep the existing facility open. We have drafted the Order to allow that, but encourage maximum use of the new facility, if and when the Order becomes effective.

We have included a 500 pound size limit as a draft condition of the Order. However, we are evaluating the acceptability of that limit, and may need to lower the value before the Order is approved.

We look forward to your comments on the draft Order. If you have questions, please call Mr. Connally Mears of my staff at (303) 837-3763.

Sincerely yours,



Robert L. Duprey, Director  
Air and Waste Management Division

Enclosure

cc: Dr. Dale Parker  
Mr. Dennis Downs  
Utah Department of Health